

REMARKS / ARGUMENTS

Claims 1-26 were rejected under 35 USC 112, second paragraph. The term "enhanced tree-style" has been removed from the claims. Accordingly, the rejection of claims 1-26 under 35 USC 112, second paragraph, is deemed to be overcome.

Claims 1-26 have been rejected under 35 USC 102(e) as being as being anticipated by or, in the alternative, under 35 USC 103(a) as obvious over Kodosky et al. (US Patent No. 6,784,903 B2).

Regarding claim 1, does not teach a method for generating an enhance tree-style graphical representation of interrelationships among a plurality of machine vision entities for display as a graphical user interface on a screen of a visual display unit of a machine vision system. Instead, Figs. 1A and 1B of Kodosky merely show a diagram that was created for illustration purposes in a patent. These Figures 1A and 1B are NOT for display as a graphical user interface on a screen of any computer system, and particularly NOT on a machine vision system, as now required by all the claims in this application. Further Figs. 6 and 8, relate to configuration of an image acquisition device, and to the generation of various types of hardware and software descriptions; both

also NOT for display as a graphical user interface on a screen of any computer system, also as now required by all the claims in this application.

Regarding the first element of claim 1, Kodosky does NOT teach the first element. For example, Kodosky is silent on teaching a hierarchical interrelationship among a plurality of machine vision entities that is to be displayed as a graphical user interface on the screen of a computer system. There is NO figure or picture in Kodosky that shows such a relationship.

Although there are machine vision entities shown in Fig. 1A for example, Fig. 1A is not to be displayed as a graphical user interface, as now required by amended claim 1, and all other claims in the application. And even if a diagram of a program, such as shown in Fig. 35 is displayed, it is illustrating a circuit design, not a machine vision system and its components. Further, there is no requirement that the circuits that are designed with the design tool of Kodosky must be hierarchical, or even a mixture of hierarchical and non-hierarchical links. Therefore, Kodosky does not teach the first element, as now more clearly claimed in the amended claims.

Regarding the second element of claim 1, Kodosky does NOT teach the second element of claim 1. This requires: “ **acquiring a second specification** that describes a plurality of non-hierarchical data flow interrelationships among said plurality of entities, the second specification being for **adding and displaying** non-hierarchical data flow interrelationships among the plurality of **machine vision entities.**” Kodosky does NOT teach “**acquiring a ... specification**”,

instead teaching merely allowing a user to program in LabView. Kodosky does not teach a **specification**. Kodosky does not teach **adding**. And Kodosky does not teach LabView manipulating or programming **machine vision entities**.

Further, there is nothing in Kodosky that explicitly teaches either creating a hierarchical or non-hierarchical arrangement of anything. Just because the system of Kodosky is “clearly capable of constructing and converting any of nodes or icons interrelationship into graphics by using the LabView graphical programming”, as stated by the Examiner, does not mean that Kodosky teaches how to use LabView to create the invention. The fact that the Examiner can **only** say that Kodosky is “capable” means that Kodosky does NOT teach, or even suggest or motivate Applicant's invention. Thus, Kodosky does not teach the second element of Applicant's claim 1.

Merely showing a non-hierarchical relationship is not enough to teach Applicant's invention. The non-hierarchical relationships must be ADDED to an already hierarchically arranged set of machine vision entities, and this is ENTIRELY absent from Kodosky. The Examiner cites Figs. 33-37, but these figures do NOT show the combination of hierarchical and non-hierarchical in the same diagram. For example, Fig. 36 is said by Kodosky at Col. 57, lines 22-26 to show a “hierarchy of data structures”, whereas Applicant's claimed invention involves **machine vision entities** (which are NOT data structures) connected by BOTH a hierarchical AND non-hierarchical relationships that ALSO involve DATA FLOW. Thus, Kodosky does NOT teach the third element of claim 1, e.g., does

not teach “simultaneously representing”, and does not teach “data flow”, merely teaching a “data structure” instead.

Moreover, Kodosky does NOT teach the fourth element of claim 1, because Kodosky is SILENT on displaying the COMBINATION of HIERARCHICAL AND NON-HIERARCHICAL relationships simultaneously. For example, the cited Figs. 33-37 do NOT show anything more than LabView diagrams of low-level digital and analog circuit diagrams, and a data structure. This has NOTHING whatsoever to do with machine vision systems, machine vision entities, and the data flow among said machine vision entities. Thus, the fourth element of Applicant's invention is not taught, suggested, or motivated by Kodosky.

Further, just because Kodosky might suggest capabilities that could be used to create Applicant's invention, mere capability is NOT sufficient, just ask having a hammer does not enable one to build a house without any knowledge of house-building. There is NOTHING in Kodosky that teaches, suggests, or motivates a simultaneous display of hierarchical relationships among machine vision elements, further interconnected by non-hierarchical data flow relationships. Given that Kodosky NEVER shows such a figure, and never discusses such an idea, it's clear that Applicant is teaching and claiming new technical matter entirely absent from Kodosky. Accordingly, the rejection of claim 1 is deemed to be overcome by the arguments and amendments presented herein.

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All of the remaining claims either depend from amended claim 1, or are analogous to amended claim 1, and therefore ALL of the rejections of the remaining claims are deemed to be analogously overcome, or are made entirely moot by the extensive amendments made herein. Accordingly, the rejection of ALL of the claims is deemed to be overcome.

The prior art made of record and not relied upon has been considered and is deemed to not present an impediment to the allowance of the present application.

Accordingly, Applicants assert that the present application is in condition for allowance, and such action is respectfully requested. The Examiner is invited to phone the undersigned attorney to further the prosecution of the present application.

Respectfully Submitted,

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